

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

GEOTAG, INC.,

v.

2:10-cv-570

AROMATIQUE, INC., *et al.*,

GEOTAG, INC.,

v.

2:10-cv-587

YAKIRA, L.L.C., *et al.*,

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO
SUBMIT AN AMENDED PROTECTIVE ORDER,
COMPLY WITH P.R. 4-1, AND EXCHANGE PRIVILEGE LOGS**

Pursuant to Dkt. No. 464¹, the current deadline for the parties to submit an amended protective order is September 4, 2012. Pursuant to the Scheduling and Discovery Order, Dkt. No. 465², the current deadline for the parties to exchange proposed terms of construction according to P.R. 4-1 is August 29, 2012, and for the parties to exchange privilege logs is September 10, 2012.

Plaintiff GeoTag, Inc. (“GeoTag”) has terminated the services of the Ni Law Firm, PLLC (“Ni Law Firm”), its counsel of record. The aforementioned counsel intend to file a motion to withdraw with the Court expeditiously after finalizing compliance with the meet and confer requirements of the local rules.

¹ The citation is to Case No. 2:10-cv-00570. Identical versions of these documents can be found in the related GeoTag cases.

² *Id.*

Accordingly, GeoTag requests that the above mentioned deadlines be extended by thirty (30) days, or as reset by the Court after consideration of the Motion to Withdraw. On behalf of GeoTag, attorneys from the Ni Law Firm, conferred with representative counsel for the defense group, and all Parties agree to this motion. The proposed extension is not sought for the purpose of delay. A proposed order is attached for the Court's convenience.

Dated: August 28, 2012

Respectfully submitted,

NI LAW FIRM, PLLC

By: /s/Hao Nii

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**ATTORNEYS FOR PLAINTIFF
GEOTAG, INC.**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on August 28, 2912, to all counsel of record who are deemed to have consented to electronic service vi the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Hao Ni
Hao Ni

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that counsel has complied with the meet and confer requirement of Local Rule CV-7(h) and that the motion is unopposed.

/s/ Hao Ni
Hao Ni